


JOSEPH R. GOODWIN
UNITED STATES DISTRICT JUDGE

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION	Master File No: 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO: All Wave II TVT Cases All Wave II TVT-O Cases	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANY
DAUBERT MOTION RELATED TO LARRY T. SIRLS, II., M.D.**

Plaintiff respectfully moves this Court for an order granting a ten (10) day extension of the filing *Daubert* Motion from the date of deposition. This is Plaintiff's first request for an extension of time for this deadline. This extension is not sought for reason of delay or for any other improper purpose. Counsel for Defendant has stated that they do not oppose the requested extension.

Due to scheduling difficulties, the deposition of Ethicon's expert Dr. Larry Sirls is scheduled for Thursday, July 21, 2016. Plaintiff respectfully moves the Court for an order extending the filing deadline for any *Daubert* briefing regarding Dr. Sirls until August 1, 2016 or by ten (10) days from the date of deposition if it is not, in fact, completed on July 21, 2016 as currently scheduled.

WHEREFORE, Plaintiff requests that the Court grant the requested ten (10) day extension from the date of deposition, moving the due date for Plaintiff's Motion to Limit the

Case Specific Opinions Offered by Larry T. Sirls, II, M.D. to August 1, 2016 and Defendants' Case-Specific *Daubert* Motions reply deadline to August 11, 2016.

Dated: July 18, 2016

Respectfully submitted,

/s/ Fidelma L. Fitzpatrick
FIDELMA L. FITZPATRICK
Motley Rice LLC
321 S. Main St., 2nd Floor
Providence, RI 02903
Phone: (401) 457-7700
Fax: (401) 457-7708
ffitzpatrick@motleyrice.com

FRED THOMPSON, III
Motley Rice LLC
28 Bridgeside Blvd.
Mount Pleasant, SC 29464
Phone: (843) 216-9000
Fax: (843) 216-9450
fthompson@motlerice.com

Plaintiff's Counsel